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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EPIC GAMES, INC.

Plaintiff, Counter-defendant
v.

APPLE INC.,

Defendant, Counterclaimant

Case No. 4:20-cv-05640-YGR-TSH

**EXHIBIT A (REDACTED) TO
DECLARATION OF MARK A. PERRY IN
SUPPORT OF APPLE INC.'S STATEMENT
IN SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL**

The Honorable Thomas S. Hixson

EXHIBIT A

(Redacted)

Bates Number of Parent Document (Folder Title)	Number	Production Beginning Bates	Production End Bates	Doc Date	Doc Time	From	To	Cc	Bcc	Subject	Original Name	Redact or Withhold	Privilege Type	Privilege Description	Additional Privilege Context	Attorneys, Legal Staff, and Employees acting at the direction of counsel	Special Master Determinations (Priv - Yes; Priv - No)	Optional Special Master Notes
PRIV-APL-EG_001624_17	1468	PRIV-APL-EG_001624_17	PRIV-APL-EG_001624_53	2024-01-09	00:50:07						Updated_Wisconsin.key	Withhold	Attorney Client	Presentation providing legal advice from counsel regarding injunction compliance requirements for link format and buttons		Document reflecting legal advice from Apple legal	No	
PRIV-APL-EG_001628_41	1514	PRIV-APL-EG_001628_41	PRIV-APL-EG_001628_46	2024-02-08	06:51:22	Lisa Jackson [REDACTED]	Tim Cook [REDACTED]	Fred Sainz [REDACTED]; Luca Maestri [REDACTED]; Greg [REDACTED]; Joswiak [REDACTED]; Philip Schiller [REDACTED]; Kate Adams [REDACTED]; Eddy Cue [REDACTED]; Kristin Huguet Quayle [REDACTED]; Isaac Rubin [REDACTED]; Marni Goldberg [REDACTED]; Hannah Smith [REDACTED]; Julien Trosdorf [REDACTED]; [REDACTED]; Kyle Andeer [REDACTED]; Sean Dillon [REDACTED]; Brendan McNamara [REDACTED]; Heather Grenier [REDACTED]; [REDACTED]; Nick Ammann [REDACTED]; Matt Browne [REDACTED]; [REDACTED]		Re: For approval: Spotify Decision Newsroom Post	20240207-2251 Re: For approval: Spotify Decision Newsroom Post.eml	Withhold	Attorney Client	Email chain providing legal advice from counsel regarding foreign regulatory issues in the European Union including DMA		Kate Adams (In-House Attorney); Kyle Andeer (In-House Attorney); Sean Dillon (In-House Attorney); Brendan McNamara (In-House Attorney); Heather Grenier (In-House Attorney)	No	

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PRIV-APL-EG_001630 01	1555	PRIV-APL-EG_001630 01	PRIV-APL-EG_001630 08	2024 -01-21	16:20:15	Tim Cook [REDACTED]	Fred Sainz [REDACTED]	Kate Adams [REDACTED]; Phil Schiller [REDACTED]; Eddy Cue [REDACTED]; Luca Maestri [REDACTED]; Lisa Jackson [REDACTED]; Greg (Joz) Joswiak [REDACTED]; Ann Thai [REDACTED]; Craig Federighi [REDACTED]; Kristin Huguet [REDACTED]; Isaac Rubin [REDACTED]; Latika Kirtane Raman [REDACTED]; Susan Prescott [REDACTED]; Matt Fischer [REDACTED]; Carson Oliver [REDACTED]; Andreas Wendker [REDACTED]; Eric Albert [REDACTED]; Jeff Robbin [REDACTED]; Kyle Andeer [REDACTED]; Heather Grenier [REDACTED]; Sean Cameron [REDACTED]; Ling Lew [REDACTED]; Trystan Kosmynka [REDACTED]; Kurt Knight [REDACTED]		Re: For Ok: DMA Docs	20240121-0820 Re: For Ok: DMA Docs.eml	Redact	Attorney Client	Email chain with redacted text reflecting legal advice from employees acting under the direction of counsel regarding foreign regulatory issues in the European Union, including DMA		Sean Cameron (Apple in-house counsel); Ling Lew (Apple in-house counsel); Heather Grenier (Apple in-house counsel); Kate Adams (Apple in-house counsel);	No	
PRIV-APL-EG_001633 35	1577	PRIV-APL-EG_001633 35	PRIV-APL-EG_001633 43	2024 -04-11	20:33:57						[REDACTED] - Differentiate between Developer - Legal Agreements.pdf	Withhold	Attorney Client	Document providing information for the purpose of obtaining legal advice to counsel regarding legal agreements for developers	This Document which consists of notes from a meeting, are withheld as they pertain to legal agreements for developers and provide information and questions directed to counsel for the purpose	Lew Ling (Apple in-house counsel), Brendan McNamara (Apple in-house counsel)	No	

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															of obtaining legal advice.			
PRIV-APL-EG_00163784	1589	PRIV-APL-EG_00163791	PRIV-APL-EG_00163852	2024-04-18	15:25:48						App Store Promotions - Marketing Legal v2 copy (Marketing Legal comments April 3).key	Withhold	Attorney Client	Document providing information for the purpose of obtaining legal advice from counsel regarding marketing restrictions.		Document reflecting information for the purpose of obtaining legal advice from Apple legal	No	
PRIV-APL-EG_00163931	1595	PRIV-APL-EG_00163931	PRIV-APL-EG_00163932	2024-01-20	16:32:18	Bri Cote [REDACTED]	Ken Moore [REDACTED]	Joseph Magnani [REDACTED]; Raf Onak [REDACTED]; Ling Lew [REDACTED]; Terry Liu [REDACTED]; Mike Tam [REDACTED]; Joe Phillips [REDACTED]; Ryan Holman [REDACTED]; Ann Thai [REDACTED]		Re: [TIMELY - DMA] Update request for external payment disclosure sheet	20240120-0832 Re: [TIMELY - DMA] Update request for external payment discl.eml	Withhold	Attorney Client	Email chain reflecting information for the purpose of obtaining legal advice to counsel regarding foreign regulatory issues in the European Union, including DMA, prepared in anticipation or furtherance of litigation		Ling Lew (Apple in-house counsel);	No	

Bates Number of Parent Document (Folder Title)	Number	Production Beginning Bates	Production End Bates	Doc Date	Doc Time	From	To	Cc	Bcc	Subject	Original Name	Redact or Withhold	Privilege Type	Privilege Description	Additional Privilege Context	Attorneys, Legal Staff, and Employees acting at the direction of counsel	Special Master Determinations (Priv - Yes; Priv - No)	Optional Special Master Notes
PRIV-APL-EG_001639 92	1611	PRIV-APL-EG_001639 92	PRIV-APL-EG_001639 94	2024-01-15	23:35:56	Hannah Smith [REDACTED]	Jennifer Brown [REDACTED]	Jeff Guebert [REDACTED] ; Liz Pulchny Bri Cote [REDACTED] ; Monika Gromek [REDACTED] ; Ann Thai [REDACTED] ; Raf Onak [REDACTED] ; Ken Moore [REDACTED] ; Terry Liu [REDACTED] ; Mike Tam [REDACTED] ; Joe Phillips [REDACTED] ; Ling Lew [REDACTED] ; Joseph Magnani [REDACTED] ; Joanna Brodbeck [REDACTED] ; Robert Olsen [REDACTED] ; Blaise Margherito [REDACTED] ; Mami Goldberg [REDACTED] [REDACTED]		Re: Wisconsin changes [Notes]	20240115-1536 Re: Wisconsin changes [Notes].eml	Redact	Attorney Client	Email chain with redacted text providing legal advice from counsel regarding injunction compliance press and communications legal strategy		Ling Lew (Apple in-house counsel)	No	
PRIV-APL-EG_001642 87	1665	PRIV-APL-EG_001642 87	PRIV-APL-EG_001643 14	2024-02-28	16:45:13						Russia Enforcement Challenges v02-rd.key	Withhold	Attorney Client; Work Product	Presentation reflecting legal advice from counsel regarding foreign regulatory issues in Russia		Document reflecting legal advice from Apple legal	No	
PRIV-APL-EG_001644 93	1674	PRIV-APL-EG_001644 93	PRIV-APL-EG_001644 97	2024-03-18	16:54:33	Mera Avdic [REDACTED]	Ramakrishna Dasari [REDACTED]			Re: Weekly Update 03/15/2024	20240318-0954 Re: Weekly Update 03-15-2024.eml	Redact	Attorney Client	Email chain with redacted text reflecting legal advice from counsel regarding foreign regulatory issues press and communications legal strategy		Update from various Apple in-house attorneys on the status of foreign activities.	No	

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PRIV-APL-EG_00165180	1732	PRIV-APL-EG_00165181	PRIV-APL-EG_00165281	2023-09-09	12:24:00						██████ - Exhibits SPA (Parallel_220923).docx	Withhold	Attorney Client	Draft document reflecting legal advice from counsel regarding merger agreement.	Draft schedule to a merger agreement (██████).	Christina Buser (Apple in-house counsel)	No	
PRIV-APL-EG_00166218	1795	PRIV-APL-EG_00166218	PRIV-APL-EG_00166219	2022-07-11	16:06:51						App Store Legal Follow Ups 7.11.2022 Notes. pages	Withhold	Attorney Client	Document related to information for the purpose of obtaining legal advice prepared by employees acting under the direction of counsel regarding foreign regulatory issues in the European Union including DMA		Amy Dobrzynski (Apple in-house counsel)	No	
PRIV-APL-EG_00166918	1888	PRIV-APL-EG_00166918	PRIV-APL-EG_00166920	2022-06-06	17:20:04						██████_Tax - Questions_clarifications (From DD, refer project level tracker for opens from BRD and further phases).pdf	Withhold	Attorney Client	Document reflecting information for the purpose of obtaining legal advice from counsel regarding developer outreach related to U.S. Link Entitlement	Document is list of legal questions for tax counsel	Armondo Cordoves (Apple in-house counsel); Jason Cody (Apple in-house counsel); Ling Lew (Apple in-house counsel); Nicole Ewart (Apple in-house counsel);	No	

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PRIV-APL-EG_00170509	2136	PRIV-APL-EG_00170509	PRIV-APL-EG_00170523	2023-08-10	16:05:07	Vijay Halepet [REDACTED]	Aaron Deardon [REDACTED]; Jason Cody [REDACTED]; Kavitha Kammath [REDACTED]	Diem Pham [REDACTED]		[Fwd: Amazon Prime Video IN payments questions]	20230810-0905 Fwd: Amazon Prime Video IN payments questions.eml	Withhold	Attorney Client	Email chain reflecting information for the purpose of rendering legal advice from counsel regarding Amazon Prime video		Jason Cody (Apple in-house counsel); Prince Zhandire (Apple in-house counsel); Katharina Kashishian (Apple in-house counsel); Pam Reid (Apple in-house counsel); Ian Marshall (Apple in-house counsel)	No	